

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
AKRON DIVISION**

In Re:

ROGER OLIVER

Debtor

CASE NO. 18-50321-amk

Chapter 13

Judge Alan M. Koschik

**OBJECTION TO CHAPTER 13 PLAN**

Creditor, U.S. Bank, N.A. as Trustee for the GSAMP Trust 2007-H1, Mortgage Pass-Through Certificates, Series 2007-H1 (“Creditor”), by and through counsel, hereby objects to the proposed Chapter 13 Plan filed by the Debtor. This Objection is hereby supported by the following Memorandum.

Respectfully Submitted

/s/ Steven H. Patterson

---

Steven H. Patterson (0073452)

Attorney for Creditor

Reisenfeld & Associates LLC

3962 Red Bank Road

Cincinnati, OH 45227

voice: (513) 322-7000

facsimile: (513) 322-7099

e-mail: ohbk@rslegal.com

**MEMORANDUM**

Creditor holds a Mortgage on the real estate located at 1917 Parkgate Ave, Akron, OH 44320. Creditor has not yet filed a Proof of Claim, however anticipates doing so listing a balance of \$207,284.09. Debtor's Plan does not address the Creditor's Mortgage. The plan must provide for surrender of the real property or for the payment of the pre-petition arrearage and post-petition regular payments.

The Chapter 13 Plan as proposed herein does not adequately protect the Creditors' interest in said real estate.

WHEREFORE, Creditor requests that confirmation be denied.

/s/ Steven H. Patterson

---

Steven H. Patterson (0073452)  
Attorney for Creditor  
Reisenfeld & Associates LLC  
3962 Red Bank Road  
Cincinnati, OH 45227  
voice: (513) 322-7000  
facsimile: (513) 322-7099  
e-mail: ohbk@rslegal.com

### **CERTIFICATE OF SERVICE**

I certify that on March 13, 2018, a true and correct copy of the Objection to Plan was served:

**Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:**

Charles Tyler, Sr, Debtor's Counsel  
charles.tyler@tylerlawoffice.com

Keith Rucinski, Bankruptcy Trustee  
efilings@ch13akron.com

U.S. Trustee  
(Registered Address)@usdoj.gov

**And by regular U.S. Mail, postage prepaid on:**

Roger Oliver, Debtor  
1917 Parkgate Avenue  
Akron, OH 44320-1107

/s/ Steven H. Patterson

---

Steven H. Patterson (0073452)  
Attorney for Creditor  
Reisenfeld & Associates LLC  
3962 Red Bank Road  
Cincinnati, OH 45227  
voice: (513) 322-7000  
facsimile: (513) 322-7099  
e-mail: ohbk@rslegal.com